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Attorneys for
JH Kelly, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In Re
PG&E CORPORATION
v.
AECOM TECHNICAL SERVICES, INC.

Case No. 4:20-cv-05381-HSG (Lead Case)
(Reference withdrawn from Bankruptcy Case
No. 19-30088, Adv. Proc. No. 20-03019 and
Adv. Proc. No. 19-03008)

(Consolidated with Case No. 3:20-cv-08463-
EMC)

**STIPULATION REGARDING PENDING
DAUBERT MOTIONS**

Plaintiff and Counterclaim Defendant JH Kelly, LLC (“JHK”) and Defendant and
Counterclaim Plaintiff AECOM Technical Services, Inc. (“AECOM”) (collectively, the
“Parties”), by and through their respective counsel, stipulate as follows:

WHEREAS, the Parties met and conferred in order to determine which of the pending
Daubert motions are still at issue, mooted and/or limited by the Court’s recent Order on
AECOM’s Motion for Partial for Summary Judgment [Dkt. No. 229] (“Order”), as well as the
impact of the Order on the presentation of expert witness testimony;

WHEREAS, after this meet and confer, the Parties agree to the following regarding the pending *Daubert* motions:

Witness	Order Does Not Apply to JHK's Abandonment Claim	Order Applies to JHK's Abandonment Claim
Greg A. McKinnon [<i>Daubert</i> Motion - Dkt. No. 203]	Full testimony	Limited testimony presented only during bifurcated proceeding before the Court.
Gerald Zamiski [<i>Daubert</i> Motion - Dkt. No. 204]	Full testimony	Full testimony
Dr. William Ibbs [<i>Daubert</i> Motion - Dkt. No. 206]	Full testimony	Possible limited testimony if the Court holds that the balance of JHK's change management support fees remain at issue following the Order.
Denise Martini [<i>Daubert</i> Motion - Dkt. No. 207]	Full testimony	Full testimony
Larry Smith [<i>Daubert</i> Motion - Dkt. No. 208]	Full testimony	No testimony
Anthony Gonzales [<i>Daubert</i> Motion - Dkt. No. 209]	Full testimony	Limited testimony regarding AECOM back-charges
Ted Scott [<i>Daubert</i> Motion - Dkt. No. 210]	Full testimony	Full testimony

IT IS SO STIPULATED.

DATED: May 31, 2022

STOEL RIVES LLP

By: /s/ Eric A. Grasberger
Eric A. Grasberger
Edward C. Duckers
Mario R. Nicholas
Attorneys for JH Kelly, LLC

DATED: May 31, 2022

TROUTMAN PEPPER HAMILTON SANDERS LLP

By: /s/ Luke N. Eaton
Marion T. Hack
Luke N. Eaton
Attorneys for AECOM

1 I, Luke N. Eaton, am the ECF user whose ID and password are being used to file this
2 Stipulation in compliance with Civil L.R. 5-1(i)(3). I hereby attest that the concurrence of the
3 filing of this document has been obtained from each of the other signatories indicated by a
4 conformed signature (/s/) within this document.

5 DATED: May 31, 2022

6 By: /s/ Luke N. Eaton
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